DANIEL G. BOGDEN United States Attorney District of Nevada ROGER YANG Assistant United States Attorneys 333 Las Vegas Boulevard South Suite 5000 Las Vegas, Nevada 89101 702-388-6336 Fax: 702-388-5087 5 6 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 -000-9 UNITED STATES OF AMERICA, ) Case No.: 2:13-cr-00091-MMD-GWF 10 Plaintiff, STIPULATION FOR PROTECTIVE ORDER 11 vs. 12 LUIS RAFAEL BATISTA, 13 Defendant. 14 15 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, 16 United States Attorney for the District of Nevada, and Roger Yang, Assistant United States 17 Attorney, counsel for the United States, Erick M. Ferran, Esq., counsel for defendant LUIS 18 RAFAEL BATISTA, that this Court issue an Order protecting from disclosure to the public any 19 discovery documents containing the personal identifying information such as social security 20 numbers, drivers license numbers, dates of birth, or addresses, of participants, witnesses and 21 victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." 22 The parties state as follows: 23 24

- 1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, drivers license numbers, dates of birth, and addresses, of participants, witnesses, and victims in this case.
- 2. Discovery in this case is voluminous. Many of the documents include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to defendants.
- 3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.
- 4. Access to Protected Documents will be restricted to persons authorized by the Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and secretaries employed by the attorney(s) of record and performing on behalf of defendant.
- 5. The following restrictions will be placed on defendant, defendant's attorney(s) and the above-designated individuals unless and until further ordered by the Court. Defendants, defendants' attorneys and the above-designated individuals shall not:
- a. make copies for, or allow copies of any kind to be made by any other person of Protected Documents;
  - b. allow any other person to read Protected Documents; and
- c. use Protected Documents for any other purpose other than preparing to defend against the charges in the Superseding Indictment or any further superseding indictment arising out of this case.
- 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

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	7. The requested restrictions shall not restrict the use or introduction as evidence or
	discovery documents containing personal identifying information such as social security
	numbers, drivers license numbers, dates of birth, and addresses during the trial of this matter.
	8. Upon conclusion of this action, defendant's attorney(s) shall return to government
	counsel or destroy and certify to government counsel the destruction of all discovery documents
	containing personal identifying information such as social security numbers, drivers license
	numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days afte
	the last appeal is final.
	DANIEL G. BOGDEN United States Attorney
	ROGER YANG Assistant United States Attorneys  U 24.13  DATE
	ERICK M. FERRAN, ESQ. Counsel for Luis Rafael Batista
	ORDER IT IS SO ORDERED this 29th day of April 2013.
	GEORGE FOLEY, J.B. United States Magistrate Judge